

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JIM BAUGH

No. 20-mj-02398-MBB

**ASSENTED-TO MOTION TO  
SUBSTITUTE THIRD-PARTY BOND SURETY**

Defendant, Jim Baugh,<sup>1</sup> with the assent of the government, respectfully requests to substitute his sister, Jillian Baugh, in place of his wife, Erica Haley, as third-party surety on his unsecured \$200,000 bond.

As grounds for this motion, undersigned counsel states:

1. Mr. Baugh was arrested in the Northern District of California, where he had been living and working, on June 15, 2020.
2. At a Zoom hearing in the Northern District of California on June 16, 2020, Mr. Baugh's wife, Erica Haley, orally agreed to serve as third-party surety on an unsecured \$200,000 bond. So far as undersigned counsel is aware, Ms. Haley has not actually signed the bond documents. The bond papers, received from N.D. Cal., are docketed in this case at DE 17-5.
3. Mr. Baugh and Ms. Haley are legally separated and commencing divorce proceedings.
4. Ms. Haley's role as surety creates unnecessary complications in negotiating a division of marital property.

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<sup>1</sup> Mr. Baugh's true given name is "Jim," not "James."

WHEREFORE, the Court should grant this motion. **As the Court may direct, Mr. Baugh can either 1) have his sister sign the existing bond form as a surety; or 2) sign a new bond form issued by the Court, along with his sister as surety. At that point, this Court would issue an order releasing Ms. Haley from all obligations as surety (and vacating the original bond if an entirely new bond is entered).**

Respectfully submitted,

JIM BAUGH  
by his attorney,

/s/ William Fick  
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**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on July 27, 2020.

/s/ William Fick